

3.

As noted in Plaintiff's complaint, Defendant is a foreign profit corporation, and Defendant's Answer admits foreign citizenship. (Complaint ¶ 2).

4.

The Complaint alleges that Plaintiff is a resident of Georgia, and Defendant does not dispute that Plaintiff is a Georgia citizen. (Complaint ¶ 1).

5.

Thus, complete diversity of citizenship exists between Plaintiff and Defendant.

6.

Plaintiff contends that on January 19, 2019, Defendant's Employee tackled or otherwise harmed her, causing serious injury. (See generally, Complaint).

7.

Consequently, Plaintiff contends that she has incurred costs in excess of \$82,000 for past medical bills and has an indeterminable amount of future medical expenses. Plaintiff's Complaint itemizes such expenses as follows: AMR EMS for \$2,108.50; Emory North Decatur for \$2,588.47; Emory Emergency Physicians for \$2,368.00; Radiology Associates of Dekalb PC for \$31.00; Grady

Health System for \$66,767.41; and Grady Memorial Hospital for \$8,956.00. This totals \$82,819.39. Consequently, assuming Plaintiff were to prevail in this case, the Complaint demonstrates that the amount in controversy, exclusive of interests and costs, exceeds \$75,000. (See generally, Complaint).

8.

This action is removable pursuant to 28 U.S.C. §§ 1332 and 1441, based on complete diversity of citizenship between Plaintiff and Defendant.

9.

Pursuant to the provisions of 28 U.S.C. § 1446, Defendant has attached (as Exhibits A and B) copies of all process, pleadings, and orders served on and filed by Defendant in the State Court of Dekalb County, Georgia for the above-styled case.

10.

Pursuant to 28 U.S.C. § 1446, Defendant is not required to file a removal bond.

11.

Written notice of the filing of this Notice of Removal will be given to all parties as required by 28 U.S.C. § 1446. Additionally, Defendant has served copies of its Notice of Filing of Removal, which it is contemporaneously filing in the State Court of Dekalb County.

12.

A true and correct copy of this Notice of Removal will be filed with the Clerk of State Court of Dekalb County, Georgia, as required by 28 U.S.C. § 1446.

WHEREFORE, Defendant respectfully requests that this lawsuit be removed to the United States District Court for the Northern District of Georgia, Atlanta Division.

Respectfully submitted, this 21st day of June, 2021.

DREW ECKL & FARNHAM, LLP

/s/ Kendra Talley

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CERTIFICATE OF FONT COMPLIANCE

The undersigned hereby certifies that *Defendants' Notice of Removal* has been prepared with one of the font and point selections approved by the Court in LR 5.1(b): Times New Roman (14 point).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing *Notice of Removal* upon counsel of record by electronically filing it with the Clerk of Court using the Electronic CM/ECF System and by forwarding a copy of same via United States Mail, postage prepaid to the to the following counsel of record, addressed as follows:

Gary Casper
W. Calvin Smith, II. P.C.
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Atlanta, Georgia 30326
(404) 842-0999
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This 21st day of June 2021

DREW ECKL & FARNHAM, LLP

/s/ Kendra Talley

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